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Waltham, Massachusetts 02451
USA

August 17, 2020

Mr. Thomas Cushing
Bureau of Air & Waste – Air Permit Chief
MassDEP Southeast Regional Office
20 Riverside Drive
Lakeville, MA 02347

RE: *Leak Detection and Repair (LDAR) Plan*
Algonquin Gas Transmission, LLC
Weymouth Compressor Station (Transmittal No. X266786)

Mr. Cushing:

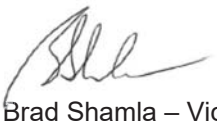
Algonquin Gas Transmission, LLC (Algonquin) was issued Air Quality Plan Approval - Transmittal No. X266786 (the Plan Approval) by the Massachusetts Department of Environmental Protection (MassDEP) on August 26, 2019 for the Weymouth Compressor Station, 50 Bridge Street, Weymouth, Massachusetts.

Algonquin is required by the Plan Approval to conduct leak detection monitoring of piping components in natural gas and pipeline liquids service. In accordance with the Special Terms and Conditions of Section 3.B., Table 12, Condition 4 of the Plan Approval, Algonquin is submitting its Leak Detection and Repair (LDAR) Plan for MassDEP review and approval. The LDAR Plan provides a system to identify every fugitive component that requires monitoring; includes leak definitions and audible, visual, or olfactory (AVO) standards; monitoring requirements and frequency; standards for initial repair, final repair, and to place an item on a Delay of Repair list; requirements for employee training; recordkeeping requirements; and the requirements for monthly AVO inspections. The LDAR Plan is consistent with and no less stringent than the LDAR requirements contained in 40 CFR 60, Subpart OOOOa.

If you should have any questions, please contact Barry Goodrich at (713) 627-4484.

"I certify that I have personally examined the foregoing and am familiar with the information contained in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment."

Sincerely,



Brad Shamla – Vice President, U.S. Operations
Responsible Official

Cc: Barry Goodrich, Enbridge

Weymouth Compressor Station & Weymouth M&R Station
Weymouth, Massachusetts

Leak Detection and Repair Program

Table of Contents

1. Introduction

Pursuant to the Massachusetts Department of Environmental Protection (MassDEP) Air Quality Plan Approval (Transmittal No. X266786) for the Weymouth Compressor Station, Algonquin Gas Transmission, LLC (Algonquin) is required to implement a leak detection and repair (LDAR) program at the Weymouth Compressor Station and Weymouth M&R Station to monitor fugitive emissions from piping components in natural gas and pipeline liquids service. The Weymouth Compressor Station is also subject to the U.S. Environmental Protection Agency (EPA) New Source Performance Standards (NSPS) Subpart OOOOa for the Oil and Natural Gas Sector. NSPS Subpart OOOOa is intended to reduce methane and VOC emissions from various segments of the oil and gas industry and includes standards for fugitive emissions monitoring at compressor stations. Affected sources that begin construction, modification (e.g., installing an additional compressor at a compressor station; or replacing one or more compressors at a compressor station with one or more compressors of greater total horsepower than the compressor(s) being replaced.), or reconstruction after September 18, 2015 are subject to the rule.

This LDAR Plan (Plan) has been developed to document Algonquin's processes and procedures for quarterly monitoring of fugitive components at the compressor station. The development and implementation of this Plan satisfies the Air Quality Plan Approval requirement to monitor piping components in natural gas and pipeline liquids service, as well as the monitoring and recordkeeping requirements established under Subpart OOOOa at 40 CFR § 60.5397a(c) and (d), and §60.5420a(c)(15) for fugitive components; Refer to Table 1 for details.

A system to identify every component that requires monitoring (i.e., monitoring map and observation path) is discussed in Section 2. Monitoring requirements, monitoring frequency, and leak definition are discussed in Section 3. Recordkeeping requirements are discussed in Section 4., and repair requirements, including standards for initial repair, final repair, and standards to place an item on a Delay of Repair list are discussed in Section 5.

Table 1 - Monitoring Plan and Rule Requirement Cross References

Requirement		Section
60.5397a(c)(1) & Air Plan Approval	Frequency for conducting surveys.	3. Monitoring
60.5397a(c)(2) & Air Plan Approval	Technique for determining fugitive emissions and leak definition.	3. Monitoring
60.5397a(c)(3)	Manufacturer and model number of fugitive emissions detection equipment to be used.	3. Monitoring
60.5397a(c)(4)	Procedures and timeframes for identifying and repairing fugitive emissions components from which fugitive emissions are detected, including timeframes for fugitive emission components that are unsafe to repair.	5. Repairs and Resurvey
60.5397a(c)(5) & Air Plan Approval	Procedures and timeframes for verifying fugitive emission component repairs.	5. Repairs and Resurvey

Requirement		Section
60.5397a(c)(6) & Air Plan Approval	Records that will be kept and length of time records will be kept.	4. Recordkeeping
60.5397a(c)(7)	For Optical Gas Imaging (OGI): (i) Verification that your optical gas imaging equipment meets the specifications of paragraphs (c)(7)(i)(A) and (B) of this section. (ii) Procedure for a daily verification check. (iii) Procedure for determining the operator's maximum viewing distance from the equipment and how the operator will ensure that this distance is maintained. (iv) Procedure for determining maximum wind speed during which monitoring can be performed and how the operator will ensure monitoring occurs only at wind speeds below this threshold. (v) Procedures for conducting surveys. (vii) Procedures for calibration and maintenance.	6. Equipment Specifications
60.5397a(c)(8)	If you are using Method 21 of appendix A-7 of this part, your plan must also include the elements specified.	Not applicable
60.5397a(d)(1)	Sitemap	2. Component Identification & Appendix A
60.5397a(d)(2) & Air Plan Approval	A defined observation path that ensures that all fugitive emissions components are within sight of the path.	2. Component Identification & Appendix A
60.5397a(d)(4) & Air Plan Approval	(4) Your plan must also include the written plan developed for all of the fugitive emission components designated as difficult-to-monitor in accordance with paragraph (g)(3)(i) of this section, and the written plan for fugitive emission components designated as unsafe-to-monitor in accordance with paragraph (g)(3)(ii) of this section.	2. Component Identification & Appendix B

This Plan will be revised as needed to reflect changes in site equipment, monitoring processes, or monitoring instrumentation. Upon request, this Plan and the information referenced in this Plan should be made available to the EPA or state agencies. This information may be stored electronically, provided that hardcopies can be made available upon request.

This monitoring plan has been developed for all fugitive emission components at the Weymouth Compressor Station in natural gas and pipeline liquids service.

2. Component Identification

A Site Map for the facility is provided in Appendix A, showing the facility boundary, equipment, piping, and the observation path.

A defined observation path is shown in Appendix A and will be used to ensure that all identified fugitive emissions components in natural gas service are within site of the path and are capable of being monitored using optical gas imaging (OGI). Fugitive components in pipeline liquids service will be assigned a unique LDAR identification number during the first monitoring event and recorded in a list. The list will be included in Appendix A of this plan prior to the second monitoring event. AGT will utilize a physical tagging system to identify each fugitive component in pipeline liquids service. Each tag will have the component's unique LDAR identification number so that the LDAR Survey results can be tracked against the list to be provided in Appendix A.

Fugitive components that cannot be monitored without elevating the monitoring personnel more than 2 meters above the surface are designated as difficult-to-monitor (DTM). Fugitive components that cannot be monitored without exposing the monitoring personnel to immediate danger are designated as unsafe-to-monitor (UTM).

Due to the use of OGI to complete the monitoring, DTM and UTM components are not expected. However, any component identified as DTM or UTM, will be included in Appendix B, along with an explanation of why each component is designated as DTM or UTM. DTM components will be monitored at least once per calendar year. UTM components will be monitored at least once every two calendar years.

3. Monitoring and Testing Requirements

Monitoring Technique and Leak Definition

Audio, Visual, or Olfactory ("AVO") inspections are a physical walk-through inspection and will be conducted on a monthly basis. AVO inspection relies upon the individual conducting the inspection to detect leaks from natural gas and pipeline liquids piping components through sound, sight, and smell. A leak is considered any detectable emissions through AVO methods.

The facility will also conduct quarterly LDAR surveys of piping components in both natural gas and pipeline liquids service. An optical gas imaging (OGI) camera will be used as the method for determining fugitive emissions from piping components in natural gas service. For OGI camera monitoring, a leak is any detectable emissions, including the visual indications of liquids dripping. Piping components in pipeline liquids service will be monitored using a gas analyzer that conforms to the requirements listed in Method 21 of 40 CFR Part 60, Appendix A. In accordance with Table 12, Provision 4.b. of the Air

Plan Approval, a leak from valves/connectors in pipeline liquids service is defined as 500 ppmv and a leak from pump seals in liquids service is defined as 10,000 ppmv.

Monitoring Frequency

An initial AVO inspection will be conducted within 30 days of startup of the Weymouth Compressor Station. Subsequent AVO inspections will be conducted on a monthly basis.

An initial LDAR Survey will be conducted within 60 days of startup of the Weymouth Compressor Station. Subsequent monitoring surveys will be conducted on a quarterly basis. Consecutive quarterly monitoring surveys will be conducted at least 60 days apart.

4. Survey Procedures

AVO Monitoring

AGT will conduct an AVO survey of the facility at least monthly. This process involves routine facility walkthrough while looking, listening and smelling for leaks. Any leaks found during the AVO inspection will be treated in the same manner as leaks found during other required inspections.

OGI Monitoring for Components in Natural Gas Service

AGT will utilize a third-party contractor to conduct the OGI monitoring events required by this LDAR program for components in natural gas service. Typically, these inspections will be performed as follows:

1) The third-party LDAR contractor utilizes an OGI Camera to scan all equipment that is in hydrocarbon service.

2) The station is broken down into areas/buildings that are identified on the station's plot plan. Once the monitoring technician begins inspecting an area, all piping components in that area are inspected prior to moving to another area. This includes all piping components associated with the major piece of equipment and all ancillary equipment connected to it. As a best practice, the LDAR contractor follows individual lines to and from the major pieces of equipment, inspecting all components on each individual line. This process ensures that all necessary piping components are monitored during the inspection.

3) The LDAR contractor will utilize the station's plot plan to ensure all necessary piping components are monitored during each OGI inspection required by this LDAR program. The LDAR contractor will place a check mark next to each building/area on the plot plan once all of the piping components in that building or area have been monitored. A copy of the station's plot plan has been included as Appendix A to this LDAR Program.

4) In order to track leaking equipment, a readily visible "leaker tag" will be affixed to equipment in the field upon discovery of a leak. The leaker tag will be removed after the equipment has been verified as repaired.

AGT will follow all applicable requirements of 40 CFR 60.18 of the "Alternative Work Practice" (AWP) standards for the OGI Camera. Additionally, the following information will be documented and maintained by the OGI LDAR technician:

- Identification of detection equipment used/ manufacturer/model no.
- Verification of capability of the OGI instrumentation
- Procedures for daily verification check
- Determination of detection sensitivity level, viewing distance, and maximum wind speed
- Provisions for operation of OGI in adverse monitoring conditions and how to deal with interferences such as steam
- Outline training and experience needed prior to performing surveys
- Procedures for calibration and maintenance (must comply with manufacturers recommended standard procedures).

Method 21 Monitoring for Components in Pipeline Liquids Service

AGT will utilize a third-party contractor to conduct the Method 21 monitoring events required by this LDAR program for components in pipeline liquids service. These monitoring events will be performed in accordance with the requirements of Method 21 as outlined in 40 CFR Part 60, Appendix A-7.

When performing Method 21 inspections, the third-party contractor will use an approved gas analyzer that conforms to requirements listed in Method 21 of 40 CFR Part 60, Appendix A. Additionally, the third-party contractor will document the Method 21 inspection for each component identified in the list provided in Appendix A. This process will ensure that all necessary pipeline liquids components are monitored during each Method 21 inspection.

The LDAR contractor will provide any necessary documentation to AGT upon request. AGT will ensure the LDAR contractor adheres to these requirements.

5. Repairs and Resurvey

Leaks Detected by AVO Inspection

Leaking fugitive components that are detected during the monthly AVO inspection that cannot be repaired during the inspection will be tagged and repaired or replaced as soon as practicable, but no later than 30 days of finding the leak, unless the leaking component is

placed on the delay of repair list. The component will be resurveyed as soon as practicable, but no later than 30 days following repair to verify the repair was effective (i.e., leak repair verification monitoring). Components will be considered "repaired" (i.e., not leaking) when no soap bubbles are observed, in accordance with the Method 21 alternative screening procedure at 40 CFR Part 60, Appendix A-7, Section 8.3.3., or no AVO indicators are detected.

Leaks Detected by LDAR Survey – Natural Gas Service

Leaking fugitive components in natural gas service that are detected during the LDAR Survey that cannot be repaired during the survey will be photographed and/or tagged and repaired or replaced as soon as practicable, but no later than 30 days of finding the leak, unless the leaking component is placed on the delay of repair list. The component will be resurveyed as soon as practicable, but no later than 30 days following repair to verify the repair was effective (i.e., leak repair verification monitoring). Components will be considered "repaired" (i.e., not leaking) when no soap bubbles are observed, in accordance with the Method 21 alternative screening procedure at 40 CFR Part 60, Appendix A-7, Section 8.3.3., or if an OGI instrument shows no indication of visible emissions.

Leaks Detected by LDAR Survey – Pipeline Liquids Service

Leaking fugitive components in pipeline liquids service that are detected during the LDAR Survey that cannot be repaired during the survey will be photographed and/or tagged and repaired or replaced as soon as practicable, but no later than 30 days of finding the leak, unless the leaking component is placed on the delay of repair list. The component will be resurveyed as soon as practicable, but no later than 30 days following repair to verify the repair was effective (i.e., leak repair verification monitoring). Components will be considered "repaired" (i.e., not leaking) when no soap bubbles are observed, in accordance with the Method 21 alternative screening procedure at 40 CFR Part 60, Appendix A-7, Section 8.3.3., or if an approved gas analyzer that conforms to the requirements listed in Method 21 of 40 CFR Part 60, Appendix A shows no indication of a leak (as defined in Section 3 for components in pipeline liquids service).

Placing Components on Delay of Repair List

Leaking components may be placed on the delay of repair list if they are unsafe to repair while the facility is in operation, if they require a blowdown to repair, or if they require a process unit shutdown. Leaking components that are placed on the delay of repair list will be repaired during the next scheduled compressor station shutdown, or within 2 years, whichever is earlier.

6. Recordkeeping

The following records will be kept for each AVO inspection and LDAR Survey and maintained for 5 years as required by §60.5420a(c)(15) and the Air Plan Approval:

- Date and time of the AVO inspection or LDAR Survey
- Personnel conducting surveys

- Training and experience of OGI camera operators
- Monitoring instrument used
- Digital video or photographs from the survey, with date and latitude/longitude embedded
- Ambient temperature, sky conditions, and maximum wind speed at the time of the survey
- Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan
- Documentation of each leaking component's location, number, type, and date of discovery, and, if not repaired during the initial survey, documentation of the Leaker Tag ID which was affixed to the leaking component
- Repair methods applied to repair the leaking component during the initial survey
- Number and type of components that were tagged and/or photographed as a result of not being repaired during the initial survey
- Number and type of DTM and UTM components monitored

The following records will be kept for each attempted repair of a leaking component and maintained for 5 years, as required by §60.5420a(c)(15) and the Air Plan Approval:

- Date of first attempt at repair
- A description of any reason for delay of repair
- The dates of any subsequent attempts at repair
- Repair methods applied in each attempt to repair the leaking component
- Date of successful repair
- Any leaking components not repaired within 30 days that need to be placed on the "delay of repair" (DOR) list.
- If parts are needed, the date parts were ordered, and the date parts were received. If shutdown is required for repair, the date of the next scheduled shutdown.
- Date of resurvey, method (i.e., soap testing or OGI) used to validate repair of fugitive emissions component, and results of the resurvey

7. Equipment Specifications

Components in gas service contain a mixture of over 95% methane and ethane, with less than 5% of C3+. Components in liquid service contain natural gas pipeline liquids, primarily in the range of C6-C10. The OGI instrument is capable of imaging methane and ethane gases, as well as evaporated liquids in the C6-C10 range.

The OGI instrument is capable of imaging a gas that is half methane, half propane at a concentration of 10,000 ppm at a flow rate ≤60g/hr from a quarter inch diameter orifice.

Optical Gas Imaging Camera Daily Verification Check

An OGI camera daily performance check will be performed on a daily basis prior to each OGI camera monitoring survey, and at other times as needed, in accordance with the following procedure.

1) Start the OGI camera according to the manufacturer's instructions, ensuring that all appropriate settings conform to the manufacturer's instructions.

2) After the OGI camera start-up process is completed and set to the intended settings, view the viewfinder to ensure that the image is clear. If the image is unclear or grainy, perform a lens assessment and follow proper lens cleaning procedure, if necessary.

3) Prior to beginning the monitoring survey, test the OGI camera as follows:
    a. Record ambient temperature and wind speed.
    b. Install a regulator on a 100 percent methane gas cylinder (verify that the cylinder contains gas). The regulator shall be capable of producing a flow rate of 0.5 liter/minute (L/min). Place the cylinder in the area where the OGI camera monitoring survey will take place or where the same environmental (wind, rain, etc.) conditions exist.
    c. Set up the OGI camera at a distance (DMax) from the outlet of the cylinder regulator that is greater than or equal to the actual distance between the OGI camera and the FECs that will be encountered during the monitoring survey.
    d. Open the valve on the regulator to set a flow rate of 0.5 L/min while observing the gas flow through the optical gas imaging instrument viewfinder. When an image of the emission is seen through the viewfinder for a minimum duration of 10 seconds, the OGI camera daily verification check is complete. The maximum distance that the emission is viewable (DMax) will vary depending on the daily conditions during the test.

Maximum Viewing Distance (DMax)

The maximum viewing distance (DMax) is determined with the Daily Verification Check. The Technician must complete the OGI camera scanning within the (DMax). Each Technician carries a laser rangefinder that they use to measure the distance between the

camera and the components being scanned. This rangefinder is used to ensure that the scanning is completed with the DMax.

Wind Speed

Wind speed is recorded during the OGI camera daily verification check. If the wind speed within the survey area(s) has a Beaufort number of five or higher, the survey will be postponed in those areas until the wind speed has decreased. A wind speed chart is presented in Table 2. All survey crews will be equipped with wind meters in order to measure local wind speeds and may take multiple measurements if wind speed vary throughout the day.

Table 2 - Wind Speed Chart

Beaufort number	Wind (km/h)	Wind (mph)	Wind classification	Wind effects on land	Wind effects on water
0	<1	<1	Calm	Smoke rises vertically	Water calm, mirror-like
1	1-5	1-3	Light air	Smoke drift indicates wind direction; still wind vanes	Scale-like ripples with no foam crests
2	6-11	4-7	Light breeze	Leaves rustle; wind felt on face; wind vanes moved by wind	Small wavelets; crests have a glassy appearance and do not break
3	12-19	8-12	Gentle breeze	Leaves and twigs constantly moving; light flags extended	Large wavelets; crests begin to break, scattered whitecaps
4	20-29	13-18	Moderate breeze	Dust and loose paper raised; small branches move	Small waves 1-4' becoming longer; many whitecaps
5	30-38	19-24	Fresh breeze	Small trees with leaves begin to sway	Moderate, longer waves 4-8'; whitecaps common; some spray
6	39-50	25-31	Strong breeze	Larger tree branches moving; phone lines whistle	Larger waves 8-13'; whitecaps common; more spray
7	51-61	32-38	Near gale	Whole trees moving; difficult to walk against wind	Sea heaps up; waves 13-20'; crests break; white foam streaking off breakers
8	62-74	39-46	Gale	Twigs break off trees; difficult to walk against wind	Moderately high waves, 13-20', with greater lengths; crests beginning to break into foam blown in white streaks
9	75-86	47-54	Strong gale	Slight damage to buildings; shingles and slates torn off roofs	High waves of 20'; rolling seas; dense streaks of foam; spray may reduce visibility
10	87-101	55-63	Storm	Trees uprooted; considerable structural damage to buildings	Very high waves, 20-30', with overhanging crests; sea white with blown foam
11	102-115	64-72	Violent storm	Widespread damage	Huge waves, 30-45', foam patches cover sea; air filled with spray; visibility reduced
12	>115	>72	Hurricane	Widespread damage	Huge waves, over 45' air filled with foam; sea all white with driving spray; little visibility

8. Common Shortfalls of Using an OGI Camera

The following are common shortfalls in using an OGI camera:

- Inexperience with camera use and the concepts of infrared thermography
- Not using multiple camera angles

- Constantly moving the camera from scene to scene without pausing in each view to look for gas images

- Many leaks are missed by relying solely on the automatic mode (manual mode can be more effective in certain situations)

- Scanning too fast and missing components

Monitoring surveys will be performed by personnel that are trained in the proper operation of the OGI camera to be used in the monitoring survey and that have prior experience using OGI cameras for the purposes of identifying fugitive emissions. Additionally, monitoring personnel shall be familiar with the types of equipment located at a natural gas compressor station. All monitoring personnel will have reviewed this Plan prior to performing monitoring surveys at the Facility.

Ensuring Adequate Thermal Background

The ability to easily identify fugitive emissions using an OGI camera decreases as the thermal energy differential between the fugitive emission and background decreases. Monitoring personnel will view each FEC using multiple camera angles and will select an angle that provides an adequate thermal background. During the monitoring survey, monitoring personnel will continuously perform a qualitative analysis of the thermal properties of the background to ensure that adequate thermal background is present. If monitoring personnel identify an area where questionable thermal background is present that may reduce the detection capabilities of the camera, one or both of the following procedures will be followed.

1) An additional OGI camera daily verification check will be performed in the area of question to verify that adequate thermal background is present.

2) A temporary background (e.g., a person or object) will be inserted into the scene(s) to create an adequate thermal background, i.e., to increase the thermal energy differential between the fugitive emission and the background.

Adverse Monitoring Conditions

Wind speed is recorded during the OGI camera daily verification check. If the wind speed within the survey area(s) has a Beaufort number of five or higher, the survey will be postponed in those areas until the wind speed has decreased. A wind speed chart is presented in Table 5.1. All survey crews will be equipped with wind meters in order to measure local wind speeds and may take multiple measurements if wind speed vary throughout the day.

Interferences

Monitoring personnel will be knowledgeable of the process streams typically present at a natural gas compressor station and will be able to identify sources of potential interference, such as steam. If a potential interference is identified, monitoring personnel will utilize alternate viewing angles to differentiate between the FEC and potential interference source.

In addition, monitoring personnel may utilize a secondary confirmation instrument (e.g., handheld gas detector) to confirm the presence of hydrocarbons in the emissions of interest.

Accurate Data Collection

Accurate data collection and entry is crucial to maintaining an effective Fugitive Emission Management Program. The data management protocol includes a data QA/QC review process that contains three levels of evaluation:

1) Technician Self Check – at the end of each assessment the technician must review each emission entry to locate and remediate any data inconsistencies

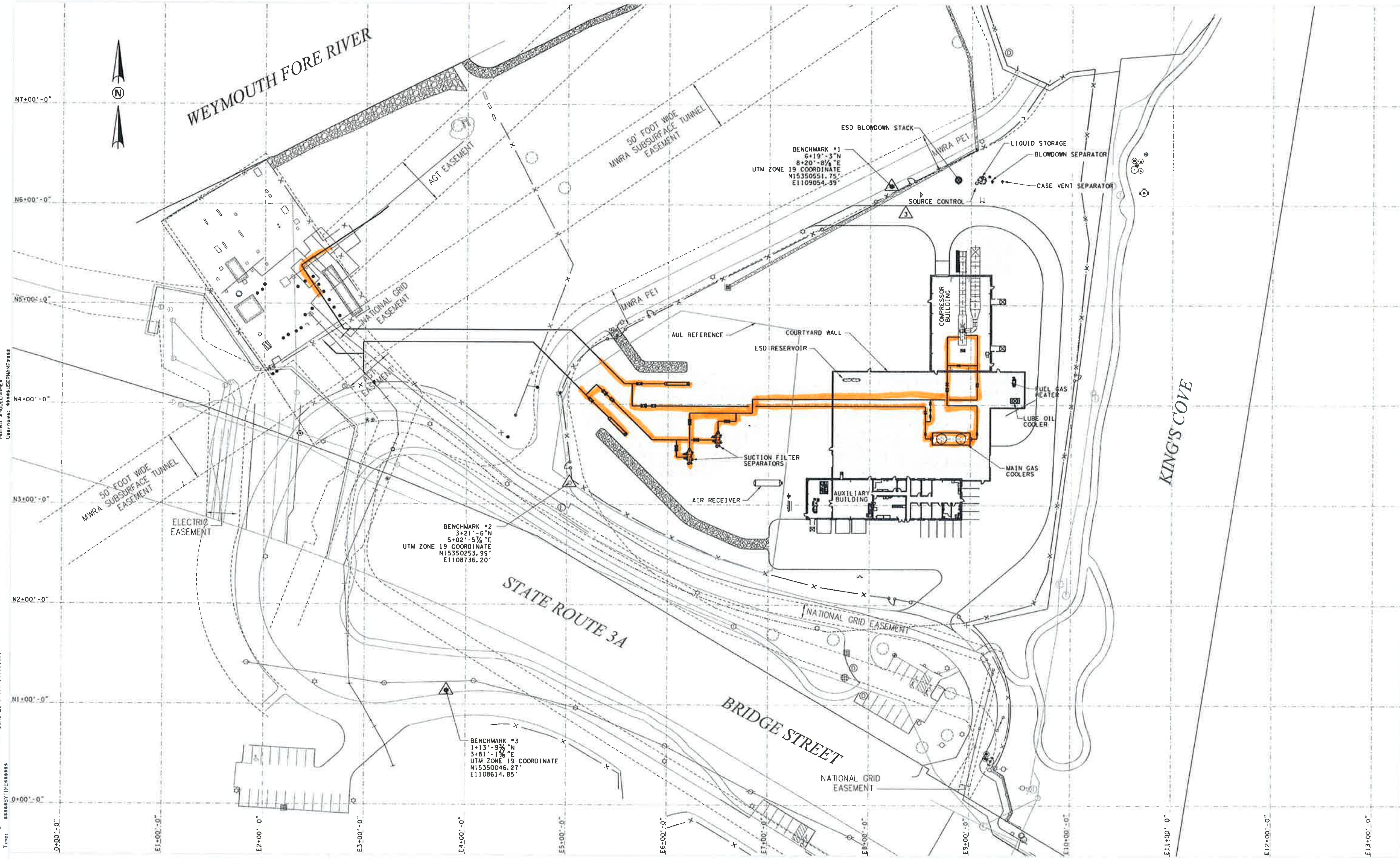
2) Team Lead Review – at the end of each work day the Team Lead will run a QA/QC evaluation on each assessment and emission to ensure that data has been entered correctly.

3) Project Manager Evaluation – on a weekly basis the project manager will run all emission data through a QA/QC data evaluation to detect and eliminate any inconsistencies.

9. Procedures for Calibration and Maintenance

Calibration and maintenance of the OGI camera will be performed in accordance with manufacturer's recommendations. Records of calibration and maintenance, as applicable, will be maintained by the OGI camera owner/operator.

Appendix A – Site Map with Observation Path



3 KJP RTB MOVE NORTH MANUAL PULL STATION/MOVE NORTH GATE
2 LMK RTB ADDED GRAVEL ROADS TO LAUNCHER/RECEIVER AND ADDED AUL BOUNDARY
1 DAJ DJF REVISED SIDEWALK LOCATION

AWH

DJF 07/28/16
AJD 07/28/16

GENERAL PLAN
GAS PIPING

WEYMOUTH, MASSACHUSETTS

Spectra Energy Partners.

Algonquin Gas Transmission, LLC
5400 Westheimer Ct. Houston, TX 77056-5310 713/627-5400

2017	CE.000089.005	1" = 40'	WEYM-A-0020	3

Appendix B –
DTM and UTM List

Difficult-to-Monitor (DTM) Component List

ID	Equipment or Fitting Description	Equipment Type	Why DTM?

Unsafe-to-Monitor (UTM) Component List

ID	Equipment or Fitting Description	Equipment Type	Why UTM?

Revision History

Revision Number	Revision Date	Initials	Summary of changes
1.0	8/14/2020	KAB	Initial Plan